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LERK'S OFFICE AT BALTIMORE

DEPUTY

The Honorable Benson E. Legg United States District Court Judge **United States District Court** for the District of Maryland Third Floor, Room 340 101 W. Lombard Street Baltimore, MD 21201

> RE: In the Matter of the Complaint of

> > Eternity Shipping Ltd., et al.

For Exoneration from or Limitation of Liability

Civil Action #: L-01-CV-0250

Victoria August Dear Judge Legg: Joy K. Sakellaris

> On behalf of all the parties in this action, I am requesting that the current scheduling order as set forth by the Court's September 26, 2002 approval of the schedule set forth in my letter of September 24, 2002, be amended.

The current factual discovery cut off is April 30, 2003, however due to the number of counsel and witnesses in Greece, the depositions to be taken in Greece could only be scheduled for the last two weeks in May 2003. Counsel also believe that an additional 30 days to June 30. 2003 would be necessary for possible depositions that could not be completed earlier or depositions of persons first identified during the Greek depositions.

The parties proposed revised schedule is as follows:

- Completion of factual discovery, exchange of initial expert disclosures (all parties) and submission of status report – June 30, 2003.
- Exchange of rebuttal/response of expert disclosures (all parties) - July 30, 2003.
 - 3. Filing of dispositive motions, August 29, 2003.
 - Completion of expert discovery October 31, 2003. 4.

APPROVED THIS IND DAY OF Vangang

Admitted in the District of Columbia and Marylana

** Admitted in the District of Columbia, Maryland and Vir EENSON EVERETT LEGG, U.S.D.J.

The Honorable Benson E. Legg United States District Court for the District of Maryland December 30, 2002 Page 2

Again, all counsel are in agreement with this proposed schedule and have pledged to cooperate and work together to complete factual discovery within the period of time proposed. We would respectfully request your approval.

Very truly yours,

Jan⁄nes∕D. Skeen

JDS/kf

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